IN THE DRAWINGS

Enclosed herewith are redline drawing corrections to add the legend "PRIOR ART" to Figures 1, 3a, 3b and 4a-4d as requested. Acceptance of these corrections is respectfully requested.

REMARKS

Reconsideration of this application is respectfully requested. The cited references, Morimoto et al., U.S. Patent 5,821,880 and Ito et al., U.S. Patent 5,729,217 fail to teach or suggest elements of the claimed precise positioning apparatus and, therefore, the claims are patentable over these references. For example, neither of the cited references teaches or suggests display information that includes a present and desired position, orientation and attitude of a structure. With reference to Figures 2 – 4 of Morimoto (which appear to be identical to Figures 2, 3 and 4 of Ito), it appears that the displayed information includes the desired position and, perhaps, the desired orientation (e.g., North, South, etc.) of the vehicle. However, nowhere do these figures or their accompanying descriptions indicate that the desired attitude of the vehicle is also displayed. "Attitude" is unlike position or orientation. Position may be regarded as the location of the vehicle and orientation as the heading of the vehicle. However, "attitude" is a description of a vehicle's or a structure's alignment in three-dimensional (or other dimensional) space, with respect to a given plane or other reference. Nowhere do the cited references indicate that such information is displayed.

In contrast, the display of a structure's present and desired attitude is a recited element of the claimed apparatus. An example of such display information is shown in Figure 6 (though other display types are possible). Consequently, because the present claims include elements neither taught nor suggested by the references the claims are patentable over these references.

Amendment -2- 02240.P015D

The Specification and drawings have been amended as requested. If there are any deficiencies of fees associated with this communication, please charge our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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